

In the Drawings

Figures 1 and 2 have been amended to correct minor informalities. Specifically, Figures 1 and 2 have been amended to include a –Replacement Sheet—legend. Replacement Sheets for Figures 1 and 2 are attached hereto in accordance with 37 C.F.R. 121(d).

REMARKS

Claims 1-6 are pending. Claims 1 and 2 have been amended. Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

Entry of this amendment is respectfully requested since it places the application in condition for allowance or at least in better form for appeal.

In the Drawings

Figures 1 and 2 were objected to for not being labeled as "Replacement Sheets". As indicated by the attached --Replacement Sheets--, Applicant has amended Figure 1 and Figure 2 in accordance with the Examiner's suggestions. Accordingly, Applicant respectfully submits that this objection is moot.

Claim Rejections Under 35 U.S.C. § 103

Claims 1-6 were rejected under 35 U.S.C. § 103(a) over Barna (U.S. Publication No. 2002/0046277) in view of Madour (U.S. Publication No. 2003/0053431). Applicants respectfully traverse this rejection.

Amended claim 1 recites, in part, a method for performing a hard handoff that includes setting up a channel link passing through a target base station controller (T-BSC) associated with a target-PDSN (T-PDSN), a source base station controller (S-BSC) associated with a source-PDSN (S-PDSN), a source packet control function (S-PCF) and the S-PDSN by establishing a channel link between the S-BSC and the T-BSC via a mobile station center (MSC) in an active packet session mode. As admitted in the Office Action, on page 6, Barna fails to teach or suggest this feature of claim 1. The Office Action, also on page 6, alleges that Madour teaches this feature and further alleges that the combination of Barna and Madour would render claim 1 obvious. Applicants respectfully disagree.

Madour relates to an intra PDSN handoff technique. Accordingly, Madour merely discloses a single PDSN 220 (See, for example, Figure 2). In Madour, the terminal 205 is attempting a handoff from a source BSC 210 to a target BSC 225 within the same PDSN network. Therefore, Madour does not teach or suggest the distinction of the S-PDSN and T-PDSN as recited in claim 1. Further, since Madour is not related to an inter-PDSN handoff, Madour does not teach or suggest that the handoff method disclosed with respect to the intra-PDSN handoff should be applied to an inter-PDSN handoff. In fact, as would be readily understood by a person of ordinary skill in the art, the issues related to inter-PDSN handoffs

and intra-PDSN handoffs are quite different. Therefore, neither Barna or Madour, separately or in combination, teach or suggest the features of amended claim 1. Accordingly, no combination of Barna and Madour teach or suggest, a method for performing a hard handoff that includes setting up a channel link passing through a target base station controller (T-BSC) associated with a target-PDSN (T-PDSN), a source base station controller (S-BSC) associated with a source-PDSN (S-PDSN), a source packet control function (S-PCF) and the S-PDSN by establishing a channel link between the S-BSC and the T-BSC via a mobile station center (MSC) in an active packet session mode, as recited in amended claim 1.

Claims 2-6 are believed allowable for at least the same reasons presented above with respect to claim 1 by virtue of their dependence upon claim 1. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

Conclusion

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

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FIG. 1

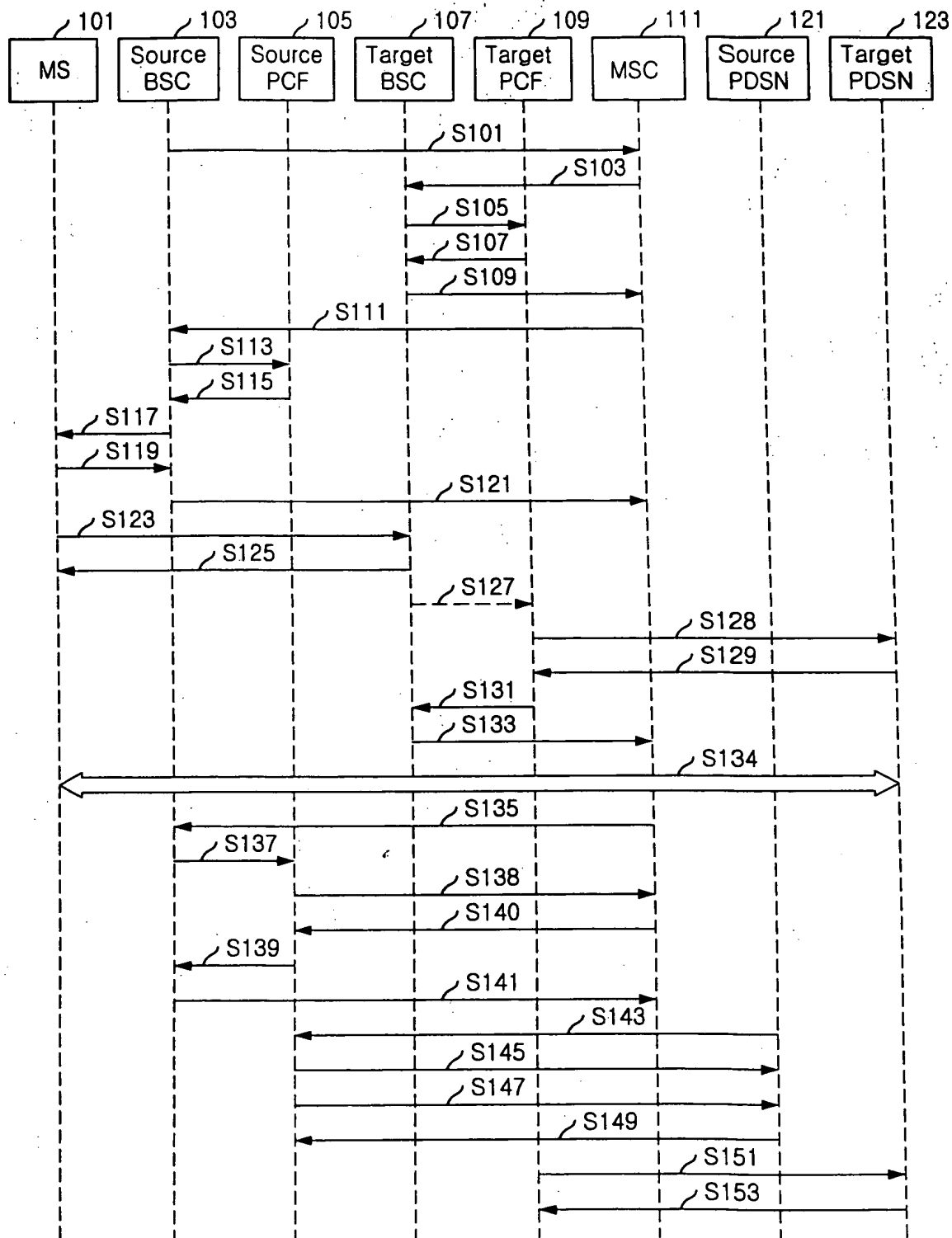




FIG. 2

